

UNITED STATES DISTRICT COURT
FOR THE
WESTERN DISTRICT OF WISCONSIN

CAROL CHESEMORE, DANIEL DONKLE,
THOMAS GIECK, MARTIN ROBBINS, and
NANNETTE STOFLET, on behalf of themselves,
Individually, and on Behalf of All Others
Similarly Situated,

Case No.: 09-CV-000413

Plaintiffs,

District Judge Conley

v.

Magistrate Judge Crocker

ALLIANCE HOLDINGS, INC., A.H.I., INC., AH
TRANSITION CORP., DAVID B. FENKELL, PAMELA
KLUTE, JAMES MASTRANGELO, and JEFFREY A.
SEEFELDT,

Defendants,

**Motion of Squire Sanders (US) LLP and
Hinshaw Culbertson LLP for Leave to
Withdraw as Counsel for Defendants
Alliance Holdings, Inc., A.H.I., Inc., AH
Transition Corp., and Nominal Defendant
Alliance Holdings, Inc. Employee Stock
Ownership Plan**

and

TRACHTE BUILDING SYSTEMS, INC. EMPLOYEE
STOCK OWNERSHIP PLAN and ALLIANCE
HOLDINGS, INC. EMPLOYEE STOCK OWNERSHIP
PLAN,

Nominal Defendants.

Squire Sanders (US) LLP and Hinshaw Culbertson LLP (collectively, "Squire Sanders") hereby move the Court for leave to withdraw as counsel for Defendants Alliance Holdings, Inc., A.H.I., Inc., AH Transition Corp., and Nominal Defendant Alliance Holdings, Inc. Employee Stock Ownership Plan (collectively, "Alliance Defendants"). The basis for withdrawal is client-request. This withdrawal would not apply to Squire Sanders's representation of Defendant David Fenkell in this matter, which is ongoing.

Alliance Defendants will not suffer any prejudice because of the withdrawal. Charles Jackson of Morgan, Lewis & Bockius LLP already has entered an appearance in this matter on

behalf of Alliance Defendants, (Doc. ## 761, 766), and will continue as their counsel. There are no motions pending before the Court for hearing, no hearing dates set, and no other conferences, motions, briefs, or reports scheduled or due.

Therefore, for the foregoing reasons, Squire Sanders respectfully requests that the Court grant leave to withdraw as counsel for Alliance Defendants.

Dated April 29, 2013.

Respectfully submitted,

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Attorneys for Defendant David Fenkell

CERTIFICATE OF SERVICE

I hereby certify that on this date I caused the following document(s):

Motion of Squire Sanders (US) LLP and Hinshaw Culbertson LLP for Leave to Withdraw as Counsel for Defendants Alliance Holdings, Inc., A.H.I., Inc., AH Transition Corp., and Nominal Defendant Alliance Holdings, Inc. Employee Stock Ownership Plan

to be electronically filed with the Clerk of Courts through the Court's Electronic Court Filing system, and that ECF will send an electronic notice of the filing to the attorney's indicated on the ECF service list.

Dated April 29, 2013.

/s/ Ryan A. Sobel

One of the Attorneys for Defendant David Fenkell